

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SABA L. SHAMI,
*On behalf of himself and on behalf of
All others similarly situated,*

Plaintiff,

v.

CASE NO: 1:13cv467

MIDDLE EAST BROADCASTING NETWORK, INC.,

Defendant.

**PLAINTIFF'S MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

COMES NOW the Plaintiff, Saba L. Shami (hereafter "Plaintiff" or "Mr. Shami") by counsel, and pursuant to Fed. R. Civ. P. 23(e) and Local Rule 7, moves the Court for Final Approval of Class Action Settlement, which motion is not opposed by the Defendant, Middle East Broadcasting Network, Inc. (hereafter "Defendant" or "MEBN"). The Plaintiff has moved separately for approval of an incentive award to the Class Representative and for attorneys' fees. For the reasons explained more fully in accompanying Memorandum in Support, the Plaintiff respectfully request entry of an Order of final approval of the Class Action Settlement, which Proposed Order is filed as an attachment to this Motion.

Respectfully Submitted,

Saba L. Shami, on behalf of himself and others
similarly situated,

/s/

Leonard Anthony Bennett
VSB 37523
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Blvd. Suite 1A
Newport News VA 23601
757-930-3660
757-930-3662
lenbennett@clalegal.com

Susan M. Rotkis
VSB 40693
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Blvd. Suite 1A
Newport News VA 23601
757-930-3660
757-930-3662
srotkis@clalegal.com

Kristi C. Kelly, Esq., (VSB #72791)
Kelly & Crandall, PLC
4084 University Dr., Suite 202-A
Fairfax, VA 22030
703-424-7570 - Telephone
703-591-0167 – Facsimile
Email: kkelly@kellyandcrandall.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

On this 11th day of April 2014, I certify that I have electronically filed the foregoing pleading in the CM/ECF system, which shall send a Notice of Electronic Filing (NEF) to:

Kevin Holden
Attorney at Law
Jackson|Lewis LLP
Two James Center
1021 East Cary Street, Suite 1200
Richmond, Virginia 23219
804.212-2888 | Direct
804.649.0404 | Main

kevin.holden@jacksonlewis.com

/s/

Susan M. Rotkis, VSB 40693
Attorney for Plaintiff
CONSUMER LITIGATION
ASSOCIATES, P.C.
763 J. Clyde Morris Blvd., Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 – Telephone
(757) 930-3662 – Facsimile
E-mail: srotkis@clalegal.com